Northern Flows

Alaska's Drinking Water Program Newsletter
Issue 41 • Spring 2011 — "Final Issue"

Message from the Manager

By James Weise

Although winter seemed to start in late October, the past several weeks of unusually nice weather here in south-central Alaska are trying to fool us into believing winter is over and spring is here. The month of March came in quietly and went out quietly. Let's take advantage of this unusually nice weather to complete those overdue activities for our water systems, our jobs, and even our lives. If we take the time now to plan for our spring and summer activities, we will be ahead of the game and not so rushed later this year.

Does the lack of a long-term financial plan for the United States, a clearly defined federal budget, and the proposed significant budget cuts at the national level have you concerned or interested in what is going on and how will it impact you? If not, it should! The lack of consistency of an agreed upon federal budget and both sustained and full funding for the Drinking Water State Revolving Fund (DWSRF) and the Clean Water State Revolving Fund (CWSRF) will have an impact on many water and wastewater systems across the nation as well as in the State of Alaska. The uncertainty at this time with federal

funding has required a conservative approach for SFY 2012 planning for the DEC Drinking Water (DW) Program. Most significantly, we are not filling two of our new positions, an Environmental Program Specialist to be located in Anchorage and an Environmental Engineering position to be located in Wasilla. Perhaps, when the federal budget is finalized, and funding levels for the DWSRF are known with some certainty, we can more appropriately determine if, and when, we can fill our vacancies to better provide the services needed by Alaska public water system owners and operators, consulting engineers, and the general public.

Continuing to look at national issues pertaining to drinking water, EPA has announced several new regulatory initiatives focused on greater public health protection from drinking water. The first regulatory initiative is the voluntary monitoring for hexavalent chromium (chrome +6) from community and non-community water systems. Currently, public water systems monitor for total chromium and the maximum contaminant level (MCL) for total chromium in drinking water is 100 ug/L (100 ppb). Fortunately, Alaska has no public water systems which have exceeded the total chromium MCL. This voluntary monitoring program is in progress and EPA will be using the information obtained from this voluntary monitoring to determine the magnitude of the hexavalent chromium problem at a national level and also to set an MCL for hexavalent chromium in drinking water. Additional national drinking water regulatory initiatives include the plan by EPA to set an MCL and regulate perchlorate in drinking water with a proposed draft rule scheduled for 2013, and also regulate a group of 16 new volatile organic chemicals (VOCs) which may be carcinogenic. Finally, the federal Revised Total Coliform Rule (RTCR) is scheduled to be finalized and published in early 2012. This is a busy year for EPA and drinking water regulatory issues. After these federal rules and new MCLs are promulgated

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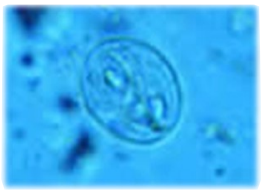
Fill and Draw Contact Times

By Lee Johnson and Dan Reichardt

The importance of disinfection of drinking water when filling an empty storage tank:

Is your public water system a seasonal or "fill and draw" system or are you planning to clean your water storage tank? If so, you will be filling an empty or nearly empty storage tank. If your system treats surface water, special care needs to be taken to ensure that you continue to provide safe, adequately disinfected water during the tank filling process. All public water systems with a surface water source must achieve at least 0.5-log (68%) inactivation of *Giardia* cysts by disinfection, with many systems requiring 1.0-log (90%) or greater inactivation.

Inactivation of *Giardia,* viruses, and other pathogens is commonly achieved by addition of chlorine, and maintaining a free chlorine residual concentration for an adequate period of time. This process is commonly referred to as meeting CT (concentration contact time). CT is the product of the free chlorine residual multiplied by the time the water is in contact with the chlorine. Units are mg/L-min.



The detention time needed for inactivation is typically provided by the time it takes the water to go through your storage tank. The required detention time is affected by the temperature of the water, the pH, and the free chlorine residual; and is dependent on volume of water in the tank and the rate water is leaving the tank to meet distribution demand. Complicating this even more is the hydraulic efficiency of the storage tank. What this means is that there is some short circuiting that takes place in the tank; the first water into the tank is not the first water out. Some water may circulate around in the tank for a long time while some of the water may go directly from the inlet straight to the outlet (short circuit).

Ideally, the easiest way to ensure proper inactivation would be to fill your tank with water at a known temperature and pH, and with the appropriate amount of chlorine to achieve the residual needed, and then let the water sit in the tank for the necessary time before making it available for potable water uses. Realistically, most water systems need to be able to provide water to meet demand during tank filling and do not have multiple storage tanks to be able to operate this way.

While this all sounds very complicated, most fill and draw systems provide more than enough CT when their storage tank is mostly full. If your system has had its Status Component Inspection and you have received your Treatment Status Summary, your ability to meet CT was likely documented in the letter. Alternatively, if your storage and disinfection system has gone through an engineering plan review, the design engineer likely looked at this scenario. Your operational approval letter from DEC may document acceptable operating conditions, including lowest tank level, highest pH, lowest free chlorine residual, and coldest temperature.

If you are a seasonal system filling an empty tank, you should plan to start up your treatment system and fill the tank prior to the opening of your system for the season. If you do your required turbidity, chlorine, and bacteria sampling when you open, you will know you and your customers have a safe supply of potable water.

If you are a fill and draw system using surface water and are refilling an empty or nearly empty tank, you may need to put your system on a precautionary boil water notice until you can be sure the water has been properly treated before distribution.

If you are unsure of how to meet CT when filling your tank, your DEC DW Program, Alaska Native Tribal Health Consortium, or Village Safe Water drinking water engineer can assist you with figuring out how to meet CT for your situation.

Sanitary Surveys

By Cindy Christian

All federally regulated public water systems are required to have a sanitary survey on a periodic basis. Most Community Water Systems (CWS) must have a survey every three years and most Non-Community Water Systems (Non-Transient Non-Community and Transient Non-Community) must have a survey every five years. A sanitary survey is an on-site inspection completed by an approved sanitary survey inspector who looks at eight critical elements of the water system. An approved sanitary survey inspector may either be a DW Program staff member or an approved third party inspector. The eight elements are: source, treatment, storage, distribution system, pumps, monitoring and reporting, management, and operator certification. Having sanitary surveys completed on a routine basis is an important activity in preventing contamination of drinking water supplies. They provide an opportunity to work and communicate with public water systems owners and operators on preventative measures and to determine the systems integrity and ability to reliably deliver an adequate supply of safe drinking water to its consumers. Periodic sanitary surveys, along with the appropriate corrective actions, are the best way we have to assure the long term safety and quality of drinking water and to provide public health protection.

The Alaska Electronic Sanitary Survey (ESS) has been designed to guide the sanitary survey inspector through the process of evaluating all of the critical components of each of the eight essential elements of the sanitary survey. The most important function of the sanitary survey is to identify deficiencies in the system that could hinder the ability of the system to provide safe drinking water.

Deficiencies can range from minor administrative issues to problems that could pose a serious threat to public health, such as direct cross connections. The DW Program places deficiencies into three categories: recommendation, minor deficiency, and significant deficiency. During the survey, the inspector will identify any deficiencies present in the system.

If any deficiencies are found during the sanitary survey, the inspector will discuss the findings with you (the owner or operator of the system) during the out-briefing process. The findings, along with the ESS, will be reviewed by your local DW Program Environmental Program Specialist (EPS) and DW Program Engineer, and you will be provided with a written, official notification of the findings and a comprehensive outline of the deficiencies. Upon notification, the PWS owner or operator must implement a corrective action plan to address any deficiencies identified by the survey. Deficiencies must be addressed according to a specified timeline depending on the severity of the deficiency. The more severe the deficiency, the quicker it must be addressed to limit any adverse impact to public health. The DW Program EPS and Engineer assigned to your system will work with you to provide feedback on any deficiencies you need to address. Most identified deficiencies must be addressed within 30 days of notification by the DW Program. Many deficiencies can be addressed and corrected right away by the PWS owner or operator. Within 30 days of receiving written notice from the State of a significant deficiency, the PWS must consult with the State regarding the appropriate corrective action. Your DW Program EPS will work with you on specific timeline requirements for corrective action. In any case, if deficiencies are found in your system, you will be required to submit a written corrective action plan. The corrective action plan must identify how the system plans to remediate or has remediated each deficiency noted in the sanitary survey report. The corrective action plan will be reviewed and approved by the DW Program. Public water systems are required to correct each deficiency noted to remain in compliance with the Drinking Water Regulations, 18 AAC 80.

1. Sanitary Survey is Completed
2. State Identifies Significant Deficiency
3. System Required to Take Corrective Action

There are many acceptable ways to correct deficiencies identified during

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What's Wrong With This Picture?

By Scott Forgue

(Answer on page 8)

SOC Monitoring Waivers

By Chris Miller

A New Synthetic Organic Contaminant (SOC) Monitoring Waiver Cycle is Upon Us!

January 1, 2011, marks the beginning of a new SOC monitoring waiver cycle. If your public water system is eligible to renew a waiver in the 2011-2013 compliance cycle, the 2011-2013 SOC Monitoring Waiver Renewal application needs to be completed and received by the Drinking Water Program by January 31, 2012. If your water system chooses to monitor for regulated SOCs, quarterly sampling must begin before March 31, 2013, to avoid sampling violations.

The SOC Monitoring Waiver Renewal Application is located here: http://dec.alaska.gov/eh/docs/dw/soc%20waiver%20renewal%20form%202011-2013%20rev%201-13-11-Final.pdf

In order to be eligible for an SOC Monitoring Waiver Renewal, a water system must meet these minimum requirements:

- Water system continues to use the same water source(s).
- There have been no changes in the location of the well(s) or water source intake(s), and that the general characteristics of the water source(s) remain the same. This includes no new land use activities that might introduce regulated synthetic organic contaminants into the water source.
- The amount of water used each year and/or the number of people using the water system remains the same.

If you meet the above criteria, the processing fee of an **SOC Monitoring Waiver Renewal is $99 per active source** (well or intake). The number of active sources for your drinking water system can be verified via Drinking Water Watch: http://map.dec.state.ak.us:8080/dww/ or by contacting the DW Program Compliance and Monitoring staff assigned to your system. Please take the time to verify the number of active sources your system has. **Incomplete applications will be returned unprocessed.**

Following 18 AAC 80.1910(a)(6)(D), if a substantial change in the waiver review area has occurred since the existing waiver was issued, fees, in addition to the $99 processing fee, may apply:

- A change which does not involve the use of a synthetic organic chemical: the fee is **$257.**
- A change which involves the use of a synthetic organic chemical: the fee is **$708.**

If a new source is added to your system or your system has recently come on-line, you must complete an **Initial SOC Monitoring Waiver Application,** located at: http://dec.alaska.gov/eh/docs/dw/Initial%20soc-ooc%20monitor%20waiver%20app%207-25-10%20rev.pdf

If you have any questions regarding the application process, please contact Chris Miller at (907) 269-7549. If you have questions on the status of your waiver application, please contact the Compliance and Monitoring staff assigned to your water system.

Message from the Manager (cont.)

By James Weise

(finalized), Alaska, as a primacy state, will be required to adopt the rules or develop similar rules no less stringent than the federal rules.

At the state level, on February 28, 2011, the State of Alaska, DEC DW Program officially obtained full primacy from EPA for the Long Term 2 (LT2) Enhanced Surface Water Treatment Rule and the Stage 2 Disinfectants and Disinfection Byproducts Rule. At this time, DW Program staff and the Department of Law have finalized the proposed regulations as part of obtaining primacy for the Ground Water Rule. We are planning to have interim primacy for the Ground Water Rule by mid May 2011. The other proposed Drinking Water regulations revisions planned for calendar year 2011 include the restructure, updating, and organizing of the Class C water system regulations into their own "self-contained" section of 18 AAC 80, and a restructure and update of the engineering regulations in Article 2 of 18 AAC 80. Additionally, we are planning to propose a set of drinking water regulations revisions later this year which will cover PWS security and emergency response planning and preparedness. Please check out the *Regulations Corner* article in this newsletter written by Gloria Collins for additional information on DEC DW Program regulatory activities in progress or planned.

We are pleased to announce the recent hire of Michelle McGlashan, Administrative Assistant, and Tyler Fanning, Environmental Program Specialist, in the Anchorage office of the DW Program. Michelle comes to us with an abundance of administrative experience. Tyler will continue the statewide PWS security awareness and emergency response preparedness activities formerly completed by Leslie Shurtleff. Leslie left state service and the DW Program in December 2010 to complete her nursing degree. Best wishes to Leslie, and welcome to the DW Program, Tyler and Michelle!

This is the 41st issue of the Drinking Water Program Newsletter – *Northern Flows*. Sadly, and after serious thought and consideration, this is our final newsletter. We started the newsletter with the Winter 1999 issue and will end with the Spring 2011 issue. The initial purpose of the newsletter was to keep public water system owners and operators, consulting engineers, technical assistance providers, Alaska legislators, and state drinking water program administrators informed on what was happening in the "world of drinking water" in the State of Alaska. I believe we achieved our initial purpose; however, it has been a struggle recently to produce a quality newsletter in a timely manner due to workload issues and staff turnover. In this age of high speed wireless technology, the DEC DW Program will be reviewing ways to provide important information about drinking water issues at both the local and national level using our website, a list server, or just e-mail notifications. Sometimes you need to let go of "doing more, less" and focus on "doing less, better."

We are getting more and more daylight each day as we progress into spring towards our greatly anticipated summer season of frenzied activities. Whatever your situation is, enjoy our spring weather, get the work done which really needs to be done, and have fun doing it. Lastly, please remember to register and plan to attend the 51st Alaska Water Wastewater Management Conference in Anchorage at the Hilton Hotel, April 26-29, 2011.

James R. Weise

James Weise
Manager
Drinking Water Program

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Regulations Corner

By Gloria Collins

Are you wondering what's new in Alaska's drinking water regulations? Read on to find out about regulations that have become final, new regulations that will go into effect this spring, and proposed regulations that may go out for public comment by summer.

In November 2010, the regulations changes that added the federal Long Term 2 Enhanced Surface Water Treatment Rule (LT2) and Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2) became effective in Alaska's Drinking Water Regulations (18 AAC 80). And on February 28, 2011, EPA granted Alaska full primacy for those two rules as well as for the Lead and Copper Short-Term Regulatory Revisions Rule, which was added to Alaska's regulations in 2009.

We are currently finishing up the adoption by reference of the federal Ground Water Rule, which we expect to have in place in mid-May. This federal rule has been enforced by EPA since 2009, but Alaska will assume enforcement of the rule after our regulation becomes effective. Adding the Ground Water Rule to our regulations has resulted in revisions of the Sanitary Survey requirements in 18 AAC 80.430, so that all types of systems—surface water, GWUDISW, and ground water—will follow the same requirements.

Several regulations projects are also under development. One is a new regulation dealing with Emergency Preparedness, which would require certain public water systems to develop information and procedures regarding emergency situations, whether man-made (vandalism and threats) or natural disasters. The recent events in Japan, following the earthquake and tsunami, are vivid reminders that we are all vulnerable to the unexpected; and we know in Alaska that many of our communities are susceptible to earthquakes, among other potential hazards. Having a game plan is the first step in handling an emergency. We expect to have this proposed regulation ready for public comment by early summer.

Another project, involving "Class C" public water systems, will place the requirements with which Class C systems need to comply in a separate area of 18 AAC 80 instead of interspersed throughout the regulations. Also, reorganization and updating of engineering-related requirements in 18 AAC 80 has begun. Our main goal with these revisions is to clarify the regulations, especially in light of new federal requirements.

On the national level, there has been much news recently about fluoride, perchlorate, and hexavalent chromium, as well as ongoing development of the Revised Total Coliform Rule. The Alaska Drinking Water Program does not plan to make regulatory changes regarding these issues at this time.

When EPA develops new or changes existing rules, the new requirements are enforced by EPA until Alaska's Drinking Water Program adopts the new requirements and obtains primacy for them. Typically, Alaska adopts the new requirements into its regulations about two years, and sometimes up to four years, after EPA issues the final rule.

Would you like to be automatically notified about upcoming changes to Alaska's Drinking Water Regulations (18 AAC 80)? If so, you can ask to have your name and address added to the Drinking Water Program's "Dear Interested Person" (DIP) List. People on this list receive a copy of the public notice for proposed changes to drinking water regulations within a few days after the public notice is issued. The public notice provides both a summary of the proposed regulations changes and instructions for submitting public comments within a specified timeframe.

Requests to be added to the "DIP" List must be made in writing and sent to the Drinking Water Program. Please direct letters to: Drinking Water Program, ATTN: Regulations Specialist, 555 Cordova St., Anchorage, AK 99501; or email your request to: gloria.collins@alaska.gov

Drinking Water Watch

By Jeanine Oakland

Public Water System Data Available on the Web

We live in a world where almost any kind of information you could want is available with a click of a button on your favorite internet search engine. Information about your local Public Water System (PWS) is readily available through several websites dedicated to providing this type of information to the public. I thought it might be good to share a couple of those sources of information with our *Northern Flows* readers so you're aware of the PWS information out there.

Drinking Water Watch: http://map.dec.state.ak.us:8080/dww/. Most folks are aware of Drinking Water Watch by now but as a reminder it is a live link to the state's DW Program database, available through the DW Program's website. This is a powerful tool that lists sample schedules, sample results, contact information, compliance and enforcement activities, and much more about each active and inactive PWS in the state. The DW Program frequently gets calls from the regulated public and the media with questions about information they've found on Drinking Water Watch. As an owner or operator of a PWS if you haven't had a chance to stop by the site yet, I encourage you to become familiar with what kind of information is available through the site.

The Significant Non-Complier List: http://dec.alaska.gov/eh/dw/dwmain/SNC.htm. This website provides the current Significant Non-Complier (SNC) List which is also available through the DW Program's website. This is a list created quarterly by the Environmental Protection Agency (EPA) that identifies systems which are deemed by EPA as being significantly out of compliance with the Safe Drinking Water Act based on the type and frequency of violations issued to the system. It's important to check this site each quarter to make sure your system is not listed. If your system is listed on the SNC List, contact your local DW Program Environmental Program Specialist (current contact information is listed on the DEC DW Program's SNC List).

Enforcement and Compliance History Online (ECHO): http://www.epa-echo.gov/echo/index.html. This is an EPA website developed by the Office of Enforcement and Compliance Assistance which currently provides integrated information about inspections, violations, and enforcement of facilities for the Clean Water Act, Clean Air Act, and Resource Conservation and Recovery Act (RCRA). There are some neat features on this website such as the "Analytics and Trends" option (see screen shot below) which will be great to utilize once the database includes PWS data. By the end of March 2011, EPA has indicated that they will be including information about the Safe Drinking Water Act as well, so data on public water systems will also be included in this website

My Water's Fluoride: http://apps.nccd.cdc.gov/MWF/Index.asp. This website is hosted by the Centers for Disease Control (CDC) which provides consumers information about the fluoride status of their community water system. The information for Alaska is entered by the Department of Health and Social Services (DHSS), Oral Health Program, based on PWS Operator reports and other data shared with DHSS from the DW Program. Much like the Envirofacts website previously discussed, this site allows you to search geographically by clicking the state of interest on a map of the United States. Once you've selected the state, you can search the information by county (borough/census area) or by water system. From there, a list of all the community water systems matching your search criteria will be displayed. To determine the fluoridation status of each of these communities you will have click on the individual system name. There is another option of reviewing a summary of the operational reports to see more information on systems that are adding fluoride.

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Sanitary Surveys (cont.)

By Cindy Christian

the sanitary survey process. For instance if the inspector determines that the well supplying the public water system is not properly constructed, the system would have to address the specific problem by possibly increasing the height of the casing above the ground, screening the vent or by having the well grouted. These types of actions are what would be identified in the corrective action plan with a specific timeline for when the improvements will need to be completed.

There are many resources available to the public water system owner or operator tasked with developing a corrective action plan. You can work with your consulting engineer or DW Program staff, and there are also several publications that outline suggested corrective action procedures. Two valuable publications are the EPA Ground Water Rule Corrective Actions Guidance Manual: http://www.epa.gov/ogwdw/disinfection/gwr/pdfs/guide_gwr_correctiveaction.pdf, and the EPA Guidance Manual for Conducting Sanitary Surveys of Public Water Systems: http://www.epa.gov/safewater/mdbp/pdf/sansurv/sansurv.pdf. The most important thing you can do as a public water system owner or operator is communicate with your local DEC office DW Program EPS and Engineer when addressing deficiencies or designing a corrective action plan. Correcting deficiencies must be done properly, or you could end up wasting a lot of valuable time and money doing things over. The primary goal of the sanitary survey is to identify conditions that could adversely affect drinking water quality and public health protection. By working together, we can best assure your consumers have a safe and adequate supply of drinking water!

What's Wrong With This Picture? (cont.) ANSWER

By Scott Forgue

What you see in the first picture is a close-up view of a sink faucet aerator covered in copper precipitants. What's wrong is that this water system has a corrosion issue. Corrosion science is a complex field and there are a number of reasons why you might see copper precipitants on fixtures. Even if the system isn't exceeding an action limit that would require further evaluation under the Lead and Copper Rule, the system is losing material from the inside of the pipes and fixtures and, if not corrected, this will eventually result in leaks.

I hope you have enjoyed the "What's wrong with this picture?" feature in the Alaska DW Program "*Northern Flows*" newsletter.

Drinking Water Watch (*cont.*) *By Jeanine Oakland*

Envirofacts: http://www.epa.gov/enviro/html/sdwis/sdwis_ov.html. This is a website created by EPA to provide the public access to nationwide PWS violation information as listed in the federal database (data is reported to EPA by states each quarter). The website allows you to search geographically by clicking the state of interest on a map of the United States. From there you can search the state's PWS violation information by water system name, county (borough), population served, and/or system status (active or inactive). Once you've put in your search parameters, the website will give you a list of the systems meeting your search criteria. You can click on the desired system name and the violation information will be listed in order of health based violations, then monitoring and reporting violations. If a formal enforcement action was taken against the system in response to a violation, that information will be listed on this page as well (see following screen shot showing a Consumer Confidence Report (CCR) violation).

Drinking Water Data and Databases (Downloadable Data): http://water.epa.gov/scitech/datait/databases/drink/pivottables.cfm This EPA website (see following screenshot) allows anyone to download Excel Pivot Tables for reviewing annual trends data, called the "Government Performance and Results Act (GPRA) tables" and other detailed inventory information on individual water systems. The GRPA tables are a set of nationwide performance indicators focused on violations that EPA reports on each year. The unique aspect of this page is that the data is offered in a downloadable format that you can work with on your computer instead of viewing the information on a webpage. The information which can be downloaded includes information for PWSs across the country so it will require some sorting to get Alaska specific information. The site includes an instructional document for how to work with PivotTables which is helpful.

As you can see, information about your local PWS is readily available through several websites for you, as well as for the customers you serve. Albert Einstein said *"Know where to find the information and how to use it - That's the secret of success"*. This article provides information to help you find the information you are looking for but how to use the information is up to you. I encourage you to take some time to explore these websites to have a better appreciation for the kind of information that is publically available. Happy exploring!

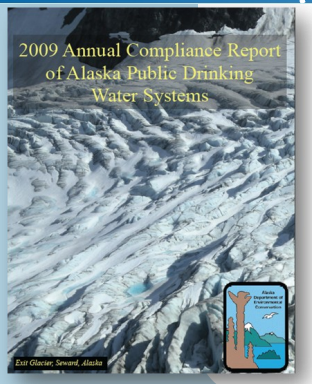
Violation information

Type of Violation	Sampling Period: Begin Date	Sampling Period End Date	Contaminant	Violation ID
CCR Complete Failure to Report	OCT-19-1999	OCT-30-1999	Consumer Confidence Rule	9999900

Enforcement information

Follow-up Action	Date of Response
Fed Compliance achieved	OCT-30-1999

2009 Annual Compliance Report *By Jeanine Oakland*



Each year the Drinking Water Program prepares an Annual Compliance Report (ACR) for Alaska's Public Water Systems (PWS) as required by the 1996 Amendments to the Safe Drinking Water Act. As a primacy state, Alaska submits data electronically every quarter to the Environmental Protection Agency's (EPA) federal database. The data transmitted includes information on PWS inventory, source, violations, and associated enforcement actions. The ACR is a summary of that data, giving an overview of the number and type of violations that were issued to Alaska's PWS over the past year. A summary of the 2009 ACR is available on the Drinking Water Program's website: http://dec.alaska.gov/eh/dw/dwmain/violations_2009.htm. To obtain a complete copy of the report please contact Jeanine Oakland at jeanine.oakland@alaska.gov or (907) 269-2007.

DIP List

By Gloria Collins

The Dear Interested Person List—"DIP List"

To add your name to the DIP List to automatically receive copies of public notices for proposed changes to Alaska's Drinking Water Regulations, contact the Drinking Water Program in writing and request to be added to the List. Direct letters to: Regulations Specialist, Drinking Water Program, 555 Cordova St., Anchorage, AK 99501; or email gloria.collins@alaska.gov

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Kathleen Spaulding	Office Assistant	269-7618
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Chris Clark	Env. Engineer Assistant	269-7516
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Mary "Tee" Little	Env. Program Specialist	376-1860
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LeAnn Smith	Env. Program Specialist	376-1844
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Eric Burg	Env. Program Specialist	x246
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